

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

In re:	)	
	)	
Traphine Freeman-Zarsah,	)	Case No: 20-12181-KHK
	)	Chapter 13
Debtor.	)	
_____	)	

**MOTION FOR VOLUNTARY DISMISSAL**  
**UNDER 11 U.S.C. SEC. 1307**

Debtor TRAPHINE FREEMAN-ZARSAH (the “Debtor”), by counsel, moves this Court to dismiss her Chapter 13 proceeding under 11 U.S.C. sec. 1307 (b). In support thereof, she states:

1. The Debtor filed a petition for relief under chapter 13 of title 11 of the United States Code (“Bankruptcy Code”) on September 28, 2020 [doc. 1].
2. The Debtor wishes for her case to be dismissed.
3. 11 U.S.C. sec. 1307(b) provides, “On request of the debtor at any time, if the case has not been converted under section 706, 1112, or 1208 of this title, the court shall dismiss a case under this chapter.”

WHEREFORE, the Debtor requests this Court to enter an order:

1. Dismissing this chapter 13 proceeding; and
2. To order any other just and equitable relief as appropriate.

TRAPHINE FREEMAN-ZARSAH  
BY COUNSEL

/s/ Martin C. Conway  
Martin C. Conway (VSB No. 34334)  
Conway Law Group, PC  
12934 Harbor Drive, Suite 107  
Woodbridge, VA 22192  
855-848-3011  
571-285-3334 (facsimile)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was mailed, postage-prepaid, and filed electronically via CM/ECF on March 17, 2021 to the creditors and parties in interest on the filed service list.

Traphine Freeman-Zarsah  
16748 Flotilla Way  
Woodbridge, VA 22191  
*Debtor*

Thomas P. Gorman  
300 N Washington St, Ste 400  
Alexandria, VA 22314  
*Chapter 13 Trustee*

/s/ Martin C. Conway  
Martin C. Conway

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In re:	)	
Traphine Freeman-Zarsah,	)	
	)	Case No: 20-12181-KHK
	)	Chapter 13
Debtor.	)	
_____	)	

**NOTICE OF MOTION**

**Traphine Freeman-Zarsah** has filed with the court a **Motion to Dismiss**.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not wish the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **March 25, 2021** you or your attorney must:

- ☐ Send to the parties listed below at least 14 days written notice of a hearing, which may be set on any regularly-scheduled motion day of the judge assigned to the case. If necessary, you may obtain a list of such dates by telephone from the clerk's office. The original and one copy of the notice must be filed with the clerk, accompanied by a motion day cover sheet, a copy of which may be obtained from the clerk. If you are not represented by an attorney, you may instead file with the clerk a written request for hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. The address of the clerk's office is as follows:

Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street  
Richmond, VA 23219

You will be notified by the clerk of the hearing date and will be responsible for sending notice of hearing to the parties listed below.

- ☒ File with the court, at the address shown above, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the court for filing, you must mail it early enough so the court will

**receive** it on or before the date stated above. You must **also** mail a copy to the persons listed below.

☐ A copy of any written response must be mailed to the following persons:

Office of The United States Trustee  
115 South Union Street, Plaza Level Suite 210  
Alexandria, VA 22314

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: March 17, 2021

/s/ Martin C. Conway  
Martin C. Conway (VSB No. 34334)  
Conway Law Group, PC  
12934 Harbor Drive, Suite 107  
Woodbridge, VA 22192  
855-848-3011  
571-285-3334 (facsimile)  
martin@conwaylegal.com  
*Counsel for the Debtors*

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing filed electronically via CM/ECF on March 17, 2021 and mailed via first-class mail to the following parties:

Traphine Freeman-Zarsah  
16748 Flotilla Way  
Woodbridge, VA 22191  
*Debtor*

Thomas P. Gorman  
300 N Washington St, Ste 400  
Alexandria, VA 22314  
*Chapter 13 Trustee*

/s/ Martin C. Conway  
Martin C. Conway